



A Nonprofit Housing and Community Development Organization

February 6, 2007

Ms. Tracie L. Billington, P.E.
Department of Water Resources
Division of Planning & Local Assistance
P.O. Box 942836
Sacramento CA 94236-0001

Ms. Shahla Farahnak
State Water Resources Control Board
Division of Financial Planning
1001 I St., 16th Floor
Sacramento, CA 95814

Re: Integrated Regional Water Management Plan Program (IRWMP):
Proposition 50 Implementation Grant Funding Recommendations and
Proposition 84 IRWMP Grant Program Concepts

Dear Ms. Farahnak and Ms. Billington:

Formed in 1965, Self-Help Enterprises (SHE) has over 40 years of experience in providing housing and community development services in the San Joaquin Valley. SHE has assisted in the development of over one hundred water and wastewater projects in disadvantaged communities, providing nearly 20,000 families with potable drinking water and environmentally safe wastewater systems.

Basic access to clean water is a priority concern for all Californians, including residents of small, low-income, rural communities. It is our understanding that funding based on approved Integrated Regional Water Management Plans (IRWMP)s is becoming a greater proportion of the total available funding for water projects in the state as a result of Propositions 50 and 84. As such, it is critical that the impacts of this funding statewide are carefully evaluated to assure that the most important needs are addressed. It is also important that the water-related needs of disadvantaged communities be met in such a program.

SHE commented late last year regarding proposed funding recommendations and some broader issues that affect San Joaquin Valley water agencies in accessing the IRWMP. Since then our staff attended the IRWMP Scoping Meeting held in Sacramento on January 23rd. These comments are related to issues proposed and/or discussed at that meeting.

Proposition 50 Funding

It comes as a shock to us that the State is considering allocating essentially all of the remaining implementation grant funds to all Step 2 applicants that requested funding in the first round. It was our understanding since the early workshops held for this program that there would be at least a second round for new applications to be submitted. A number of water agencies around the State and in the San Joaquin Valley have been preparing and improving IRWM plans in order to compete for this second round of Proposition 50 funding. We urge the State to reconsider this position and conduct a second round as originally planned.

Statewide Priorities Ranking Criteria

We also recommend that for this reinstated second round of Prop 50 funding that the category of "statewide priorities" be dropped. This standard was used to develop the list of Round 1 IRWMP applicants recommended by your agencies to receive Proposition 50 funds. All applicants from the San Joaquin Valley ranked as "low" to "medium low" in the "statewide priorities" standard, thus eliminating them from competition. Incidentally, this standard does not appear in the text of Proposition 50.

As an alternative, if "statewide priorities" are used for ranking in the Prop 50 IRWMP or Prop 84 IRWMP, it is requested that a re-evaluation of statewide priority ranking criteria be considered to more accurately reflect the importance of water issues of Statewide significance in the San Joaquin Valley. This region faces serious overdraft of groundwater, salinity issues, water quality issues, a tremendous growth rate, and the further reduction of winter snow pack. This is compounded by the impending loss of water that will result from the recent NRDC/USBR settlement. The San Joaquin Valley is one of the most challenging areas of the country to provide an adequate source of quality water, provide flood protection and at the same time maintain and restore the environment.

Proposition 84

Disadvantaged Communities

At the meeting, a proposal was made to change the definition of a Disadvantaged Communities from 80 percent of statewide median household income (MHI) to 80% of the MHI of the county or hydrologic unit. We strongly disagree with this approach since this would redirect the priority for funding from the neediest parts of the State. Thus far, it is our understanding that the IRWMP Program has funded few projects that directly benefit disadvantaged communities. Therefore, there is more reason than ever to target funding that serves these truly needy areas of the State.

We are in support of DWR assisting disadvantaged communities early in the process to make them part of the planning process. We are in favor of the proposal to have a set-aside for disadvantaged communities, and believe the amount should be commensurate with the need in disadvantaged communities throughout the State. The allocation of funding for projects that directly benefit disadvantaged communities is crucial.

Other


The proposal to move away from competitive grants to a performance based granting of the IRWMP appears to be beneficial if the intent is to encourage joint ventures between the State and local agencies to improve IRWM plans and projects in a cooperative manner.

Projects which replace deteriorated infrastructure such as leaking pipelines and tanks that are likely to fail in disadvantaged communities should also be eligible for IRWMP funding.

Funds should be allocated to update and gather data to update Basin Plans for Regional Water Quality Control Boards under Section 75027 (b). Basin Plan updates in the Central Valley Region due to chronic funding constraints are generally limited in scope. Consequently, the current basin plans remain significantly based on science available when the plans were first enacted in the early 1970's. Basin Plan updates must be funded to provide a regulatory framework to protect water quality and to plan infrastructure investments to support population growth and sustainable economic development.

Thank you for your consideration of our comments.

Sincerely,



Peter Carey
President/CEO

cc: Linda Adams, Secretary California Environmental Protection Agency
Mike Chrisman, Secretary California Resources Agency

Senators:

Senator Roy Ashburn
Senator Greg Aghazarian
Senator Dave Cogdill
Senator Jeff Denham
Senator Dean Florez

Assemblymembers:

Assemblyman Juan Arambula
Assemblyman Tom Berryhill
Assemblywoman Jean Fuller
Assemblywoman Cathleen Galgiani
Assemblyman Bill Maze
Assemblywoman Nicole Parra
Assemblyman Michael Villines